

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

ELLIOTT BROIDY and
BROIDY CAPITAL MANAGEMENT, LLC,

Plaintiffs,

v.

GLOBAL RISK ADVISORS LLC,
GRA QUANTUM LLC,
GRA RESEARCH LLC,
GLOBAL RISK ADVISORS EMEA
LIMITED,
GRA MAVEN LLC,
QRYPT, INC.,
KEVIN CHALKER,
DENIS MANDICH,
ANTONIO GARCIA, and
COURTNEY CHALKER

Defendants.

Case No. 1:19-CV-11861

Oral Argument Requested

NOTICE OF PLAINTIFFS' MOTION FOR SANCTIONS

PLEASE TAKE NOTICE that, upon the accompanying Declaration of Elliott Broidy; the accompanying Declaration of Daniel R. Benson and the Exhibits annexed thereto; the accompanying Memorandum of Law in Support of Plaintiffs' Motion for Sanctions; and all prior pleadings, papers, and proceedings herein, Plaintiffs Elliott Broidy and Broidy Capital Management, LLC ("Plaintiffs") will move, by the undersigned counsel, before the Honorable Mary Kay Vyskocil, United States District Judge, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, Courtroom 18C, New York, NY 10007, on such date and time to be set by the Court, for an order awarding Plaintiffs their attorneys' fees and expenses incurred in connection with investigating and litigating Gibson Dunn's conflict of interest, including those associated with this motion, in an amount to be determined by the Court.

PLEASE TAKE FURTHER NOTICE that Plaintiffs respectfully request oral argument in connection with this motion for sanctions, and will file a letter to that effect pursuant to Section 4.A.vii. of Judge Vyskocil's Individual Rules of Practice in Civil Cases.

PLEASE TAKE FURTHER NOTICE that, in accordance with the Court's Scheduling Order dated January 3, 2023 (ECF No. 160), Defendants' opposition, if any, is to be filed on or before March 6, 2023 and Plaintiffs' reply is to be filed on or before March 13, 2023.

Dated: February 23, 2023

Respectfully submitted,

KASOWITZ BENSON TORRES LLP

By: /s/ Daniel R. Benson

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